



the Defendant herein, acting with others known and unknown to the grand jury, did knowingly possess a firearm in furtherance of a drug-trafficking crime which may be prosecuted in a Court of the United States, to wit: distribution of cocaine base ("crack"), as set forth in Count One of this Indictment, which is re-alleged and incorporated herein; and in the course thereof, caused the death of a person through the use of a firearm, the killing of whom constituted murder as defined in Title 18, United States Code, Section 1111, in that the killing was committed willfully, deliberately, maliciously and with malice aforethought.

In violation of Title 18, United States Code, Sections 924(c)(1), 924(j), and 2.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
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